

EXHIBIT A

Supplement Expert Report
MDL Johnsons' Baby Powder Application and Exposure Container Calculations
For Six Ovarian Cancer Victims Bellwether Cases

May 2, 2024



Prepared by:

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Exhibit

10

and Environ. Hygiene J. 55; and

- Ewing, Longo, et al., *Zonolite Attic Insulation Exposure Studies* (2010) 16 Int'l J. of Occup. and Env't Health 279.

Further, my research regarding the analysis of cosmetic talc powder products, including asbestos content and releasability upon use, has been published in the peer-reviewed literature. [Steffen, et al., *Serous Ovarian Cancer Caused by Exposure to Asbestos and Fibrous Talc in Cosmetic Talc Powders—A Case Series* (Feb. 2020) 62 J. Occup. Environ. Med. e65.] My research and peer-reviewed publications about the analysis and testing of asbestos-containing materials, as described above, may be found in my Curriculum Vitae (**Exhibit A**).

My consulting extends beyond testimony for plaintiffs in asbestos cases. MAS consults with defense firms and outside the litigation context with well-known companies such as Scotts, Hitachi, Intel, BMW, Honda, Dow, and Union Carbide. MAS is a leading engineering consulting firm that provides a broad range of services, including environmental and industrial hygiene and emissions testing of construction products. MAS has performed consulting work for government agencies such as the Centers for Disease Control and the National Institutes of Health. MAS has also worked as an expert for the City of New York, State of New York, State of Hawaii, State of Texas, State of Utah, City of Los Angeles, City of Baltimore, City of Chicago, and the City of Boston in their respective litigation against asbestos companies for property damage litigation. MAS has been involved in testing asbestos-containing materials for over 30 years and has analyzed hundreds of thousands of asbestos samples.

I have been qualified many times in courts throughout the United States as an expert witness in material science, optical and electron microscopy, and industrial hygiene matters relating to asbestos issues, including cases involving talc and talc powder products. My methodology in analyzing talc and cosmetic talc powder products for the presence of asbestos was subject to a Daubert hearing in the New Jersey ovarian cancer MDL and has been found reliable.

Moreover, I have been qualified as an expert witness regarding my analysis of cosmetic talc powder products in more than 30 cases by courts across the country in 8 states. In this Court, I was qualified as an expert witness in asbestos-related industrial hygiene and as a materials scientist in a talc trial involving Defendant Colgate-Palmolive Company ("Colgate") and Johnson & Johnson in *Schmitz v. Johnson & Johnson*, Case No. RG18923615. I have also testified at the following trials in this Court involving cosmetic talc powder products: (i) *Leavitt v. Johnson & Johnson*, Case No. RG17882401; (ii) *Prudencio v. Johnson & Johnson*, Case No. RG20061303; and

From 2004 to 2018, J&J used Chinese talc as their talcum powder. Our analysis of 24 JBP non-historical JBP container samples from this time period, and 11 historical Chinese ore samples, determined that of these two groups of samples were positive (91%) for either amphibole asbestos and or chrysotile.

Summary of Mrs. Rausa J&J Container usage

Johnson's Baby Powder Vermont Sourced Talcum Powder: **420 JBP 9 oz. containers**

Johnson's Baby Powder Chinese Sourced Talcum Powder: **168 JBP 9 oz. containers**

Total JBP Containers = 588 JBP 9 oz. Containers

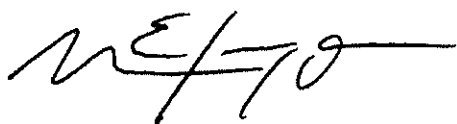
Conclusion

For the six ovarian cancer victims it would be my opinion a reasonable degree of scientific certainty that they would have had a substantial exposure to asbestos during the many years that they used this J&J talcum powder product.

Also, it is my opinion that there was not any evidence that these six ovarian cancer victims Bellwether Cases had any alternative exposure to asbestos-containing materials other than the J&J talcum powder products.

All of the opinions I have given in this report, I hold within a reasonable degree of scientific certainty, and I reserve the right to amend this report if new information becomes available.

Sincerely,



William E. Longo, Ph.D., CEO